

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DISTRICT

HOTHMAN MISANE, TYLER  
SLEEP and JEROL WILLIAMS,

Plaintiffs,

Case No 21-487  
Judge Hala Y. Jarbou  
Magistrate Judge Ray Kent

v.

CITY OF BANGOR, TOMMY SIMPSON,  
MAYOR DARREN WILLIAMS and SCOTT GRAHAM,

Defendants.

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**STIPULATED PROTECTIVE ORDER**

**IT IS HEREBY STIPULATED AND AGREED** by and between the parties through  
their respective counsel that:

**IT IS HEREBY ORDERED** that the production of any documents concerning the internal policies, procedures and/or general operations of the City of Bangor and the Bangor Police Department, and/or documents concerning internal investigations, citizen complaints, internal memoranda, training logs, and/or documents contained in the personnel and/or disciplinary files of the Defendants and/or other City of Bangor employees, which may or may not be produced voluntarily or pursuant to court order, will be subject to the following protective conditions:

1. The documents involved may contain, in part, confidential and/or privileged information regarding the Defendants and/or other City of Bangor employees and/or policies, procedures, or internal investigations of the City of Bangor, and that the dissemination of said materials may hinder law enforcement and/or interdepartmental investigations, policies and/or procedures, and/or endanger the safety of Defendants and/or other City of Bangor employees and their respective families.

2. The information derived from these documents shall be used solely and exclusively for purposes of this lawsuit. Such information shall not be used in or for other cases, proceedings or disputes, or for any commercial, business, competitive or any other purpose whatsoever.

3. The aforementioned materials may not be disclosed to any person other than parties, counsel of record for the respective parties to this litigation, the paralegal and clerical staff of same, expert witnesses or consultants engaged by counsel, deponents at any deposition in this action, during the course of and in preparation for deposition or testimony in this action, and the court and court personnel, under such safeguards as the court may direct so as to preserve and to protect the confidentiality of information made reference to herein.

4. All the persons to whom this confidential information and/or documents are disclosed are hereby enjoined from using the same except in connection with this litigation (under such safeguards as the court may require) and from disclosing the same to any other person except as provided herein. A breach of the provisions of this order shall be subject to appropriate sanctions, in the discretion of the court, as authorized by any statute, rule or the inherent power of the court, or as otherwise provided by law.

5. The provisions of this Order shall survive and remain in full force and effect after the entry of final judgment (including any appellate proceedings) in this case, whether by settlement or litigation unless otherwise ordered by this Court.

6. The production of documents subject to this Order does not constitute an admission or agreement that any document or information is admissible as evidence in this case.

7. Any and all materials supplied by Defendants under the terms of this Order shall be destroyed or returned to counsel for Defendants within thirty (30) business days of the conclusion of this litigation. Counsel for Defendants shall submit a written request concerning the destruction or return of said material to counsel for Plaintiff.

8. Notwithstanding the above, last known addresses and social security numbers of any employee of the City of Bangor shall not be furnished to Plaintiffs. Given same, defense counsel will voluntarily produce said witnesses, if necessary, for deposition and/or trial in this matter.

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U.S. DISTRICT COURT JUDGE

**ATTORNEY SIGNATURES ON FOLLOWING PAGE**

Stipulated and approved by:

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